

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

S.C.,)
Plaintiff,)
vs.)
DIRTY WORLD, LLC, a Delaware limited)
liability company,) Case No: 4:11-cv-392
and)
NIK RICHIE, an individual,)
Defendants.)

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56, Defendants DIRTY WORLD, LLC (“Dirty World”) and NIK LAMAS-RICHIE (“Richie”) (collectively, “Defendants”), respectfully move this Court for an order granting summary judgment in their favor as to all claims in this matter. As a matter of law, Plaintiff’s legal theory set forth in her Complaint is barred by the Communications Decency Act, 47 U.S.C. § 230(c)(1), and the First Amendment to the U.S. Constitution. In support of this Motion, Defendants submit their Suggestions in Support filed contemporaneously herewith.

ARMSTRONG TEASDALE LLP

BY:/s/ Darren K. Sharp

Darren K. Sharp MO #50841
2345 Grand Boulevard, Suite 2000
Kansas City, Missouri 64108
816.221.3420
816.221.0786 (facsimile)
dsharp@armstrongteasdale.com

AND

GINGRAS LAW OFFICE, PLLC
David S. Gingras (to be admitted *pro hac vice*)
3941 E. Chandler Blvd., #106-243
Phoenix, AZ 85048
Tel.: (480) 668-3623
Fax: (480) 248-3196
DAVID@GINGRASLAW.COM

ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served via the Court's ECF system and via Regular U.S. Mail this 24th day of May, 2011 to:

Matthew J. O'Connor, Esq.
Bradly H. Bergman, Esq.
Mid-America Trial Lawyers
523 Grand Blvd., Suite 1B
Kansas City, Missouri 64106
mjoc@workingforjustice.com
bhb@workingforjustice.com

Attorneys for Plaintiff

s/ Darren K. Sharp
Attorney for Defendants